

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**CRYSTAL SEAMAN,**

\*

**Plaintiff,**

\*

**vs.**

**\* Case Number: 2:05-CV-00414-T**

**FOOD GIANT SUPERMARKETS, INC.,**

\*

**Defendant.**

\*

**AFFIDAVIT OF MARCY REID**

Personally appeared before me, the undersigned authority, Marcy Reid, who being known to me and first duly sworn, deposes and says as follows:

1. My name is Marcy Reid. I am no longer employed with Food Giant Supermarkets, Inc., but I was the manager of the Piggly-Wiggly Store owned by Food Giant in Florala, Alabama on the date of this accident. I am over the age of 19 years, I have personal knowledge of the facts contained in this affidavit, and I am competent to testify at trial if called to do so.

2. On the date of this accident, April 25, 2003, I was notified of an incident involving Crystal Seaman at the entrance ramp of the store where it meets the parking lot. This is the first time anyone ever complained of this ramp, and to my knowledge, is the first time anyone was allegedly injured while attempting to walk on this ramp.

3. Crystal Seaman indicated one of the wheels of her buggy got caught in a dent within the ramp. This was the very first time I had heard of anyone getting their buggy caught on a dent on this ramp. There had never been a problem with this ramp while I was an employee with Food Giant, and I had been working at this store since January of 2002.

4. I was unaware of any alleged defect or dent in this ramp until this incident, and no one had ever notified me about this dent or any other alleged defect on the ramp before this occasion. This was the only incident with regard to this ramp while I was employed at the store.

5. I also inspected the ramp after the incident. I saw no loose concrete or gravel on the ramp that could have caused injury to a customer.

Further affiant sayeth not.

Marcy Reid  
Marcy Reid

STATE OF ALABAMA

COUNTY OF HOUSTON *(coffee)*

I the undersigned Notary Public in and for said County and said State, hereby certified that MARCY REID, who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, she executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this 4 day of June, 2005.

Amanda R. Nobles  
NOTARY PUBLIC  
My commission expires: 7/2/08